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December 14, 2001

John A. Young, Director
Air and Land Protection Division
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Re: Your letter of November 28, 2001 to Jim Lanzafame

Dear John,

We had intended to respond to your letter at the meeting scheduled for December 13th, but since MDNR cancelled that meeting, I thought it important to respond in writing so that you would understand our plans concerning the points you raised in your letter of November 28th. For convenience, I have simply copied and underlined your points from that letter.

1. Doe Run's current efforts and plans for alternate delivery of concentrate. To include a listing of any environmental concerns and potential Department of Natural Resources approvals and permits.

Although we maintain that MDNR has jurisdictional limitations in regulating our mode of transportation and the use of roads, I can share our plans. Regarding our material movement strategy, significant progress has been made on the key element of changes that we are contemplating. I am happy to report that as of December 10th we have a contract with the railroad to haul concentrate from Glover to Herculaneum. The contract is for three years. You should be aware that there is a cancellation clause in the contract which they required but don't expect to use. We expect and intend, once up to full speed, during normal conditions, to receive our Missouri concentrates at Herculaneum by rail.

Aaron Miller, Dan Vornberg, and Lou Marucheau, along with several of our Air Quality consultants, had a constructive meeting on November 29, 2001, with the Air Program in your Jefferson City offices, and were able to obtain a clear understanding of the steps necessary to permit the trans-loading facilities at the Glover facility. The first step was to finalize the decision on the proposed alternative and to transmit that to the Department.

That was accomplished December 11th. The next step, pending feedback from the Air Program, is to submit a complete permit application and some updated air modeling for lead. The engineering drawings are under development.

Simultaneously, the rolling stock is being inspected and made rail ready to railroad specifications. The fiberglass covers are being measured and ordered.

Pending Air Program feedback, the most likely scenario is that the existing receiving building would be utilized for partial shipment on an interim basis until the new unloading facility is completed. This partial rail shipment might be as of March 1, 2002. We still need to hear from the cover manufacturer on their timing before that becomes clear.

2. Greater detail on Doe Run's abilities and intent to clean homes found with lead contamination. Because of time limitations, this topic was simply announced with no details of explanation.

With regard to the house dust program, I am restating the action items from a document that we transmitted on the house dust program to Dave Mosby, Tony Petruska, and Bruce Morrison on November 23 (this version is updated to reflect the results of several e-mails and conversations between the parties). This is a concept paper and what is actually done is subject to discussion. As you know we have already initiated the house sweeper program. I omitted the health protection logic for the suggestions here to simplify the letter, but that background is included in the original e-mail.

Provide mass-market department store type HEPA vacuums to each household in areas within 0.7 mile from the smelter or house with elevated child. (There has been a map developed now delineating the exact houses, which are eligible.)

As a one-time measure provide mass-market department store type HEPA vacuums to each household within the 0.7 mile distance from the smelter.

Post soil abatement house dust cleanup (for areas exhibiting air lead levels below 1.5 ug/M3 for the quarter prior to the soil replacement) in houses where young children live or visit regularly.

Cleaning crew makes a one-time visit. Lead trained cleaning crew under modified site-specific lead abatement training program by Doe Run's Hygienist. Employees following general lead worker rules, such as leave at work clothing, shower at end of shift, eat in clean cafeteria or change building, no smoking on job etc.

Use HEPA filter vacuums for all carpeted surfaces and upholstered furniture. Wet mop all hard-surfaced floors three times with tri-sodium phosphate rinsing each time with clean water. Clean windows, windowsills, and window wells with tri-sodium phosphate solution. Wipe down walls in children's rooms and play areas with tri-sodium phosphate

solution. Basement cleaning will be limited to vacuuming unless there are finished rooms in which case the procedures outlined above will be followed.

Change air filter and provide package for 4 changes subsequently. Provide plastic trash bags for disposal in regular trash according to Missouri DNR's lead remediation household solid waste circular.

Pre-soil abatement cleaning (as an interim measure) where any elevated blood lead Child lives in the study area, or for properties adjacent to either haul road or areas that experience air lead levels above 1.5 ug/M3 the previous quarter, for homes where young children live or visit regularly.

Same crew and guidelines as post remediation cleaning but offered to houses along the haul road and in areas experienced air lead levels in excess of the 1.5 ug/M3 standard the previous quarter. Would be offered to homes in this sub zone where young children live or visit regularly or homes of children with elevated blood leads above 10 ug/dl.

This service would be offered every three months until the monitor representing that area is within the 1.5 ug/M3 ambient air lead level for the previous calendar quarter or the SIP controls and AOC contingency projects are in place.

3. Doe Run's current "house keeping" efforts, to include internal improvements (paved roads, sumps, etc) at the smelter facility and those in the City of Herculaneum. It would be helpful to include any monitoring or sampling information you are collecting to show the success of these efforts.

We have taken a number of steps regarding housekeeping in the last three months. This process, but not the specifics, were committed to the Department and EPA on the conference call on August 31st and memorialized in a letter from EPA that same day.

a) Complete paving of the East haul road.
b) Completed the concentrate truck unloading station.
c) Implemented a plan to sweep streets on a daily basis
d) Cleaned (vacuum) sidewalks and filled cracks.
e) Moved flux material from river area to inside the RR tracks on the East side of the plant.
f) We are reducing certain piles of materials on the plant site. A specific metallurgical engineer has been charged with that responsibility. The estimate is approximately 3,000-5000 tons per month of stored materials are being consumed.

4. Greater information concerning the submitted truck unloading facility. I expect clearer detail on the actual facility, how this fits with all other truck and vehicle activities, location of washing facilities, truck scales, vehicle routes, etc. Doe Run should prepare a more detailed plan to continue to provide for cleaning of trucks. Your internal memorandum does not provide sufficient insurance that trucks or the new unloading

station will be sufficient insurance that trucks or the new unloading station will be sufficiently cleaned to prevent tracking of lead into the community. Observations of the new truck unloading procedure indicate that concentrate adheres to the back of the truck and may contaminate the wheel grizzly. Please provide a plan to address these issues, which includes a more thorough truck cleaning procedure and periodic sampling to demonstrate that recontamination of haul roads and the neighboring community from truck does not occur. The plan should also address re-contamination potential form trucks entering and leaving the plant through the south side of the facility.

Now that the railroad component of material movement strategy plan appears to be possible and is being implemented, Doe Run is focusing on other adjustments in its material movement strategy. This strategy encompasses barge, truck, and railroad elements. We have decided to refer it to the Herculaneum Advisory Committee to see if they are interested in advising us on this matter. Following that, we may make a presentation to Herculaneum City government especially regarding the truck haul route concept if that becomes an element of our strategy.

In response to your concern about contamination from trucks, we are assessing risk in this regard. We believe the potential risk of these activities can be assessed fairly and provide a yardstick of what is acceptable in this regard.

This is the process that we are planning to follow. A report will follow from that process which will be more completely responsive to your request.

Even though there may be continuing community interaction on this issue, we will forward an interim report of our intentions concerning material movement strategy when it is prepared in about a month.

5. Doe Run's ability to finish all required smelter upgrades before the July 2002 schedule outlined in the administrative Order on Consent. You mentioned the ability to complete these by April 2002.

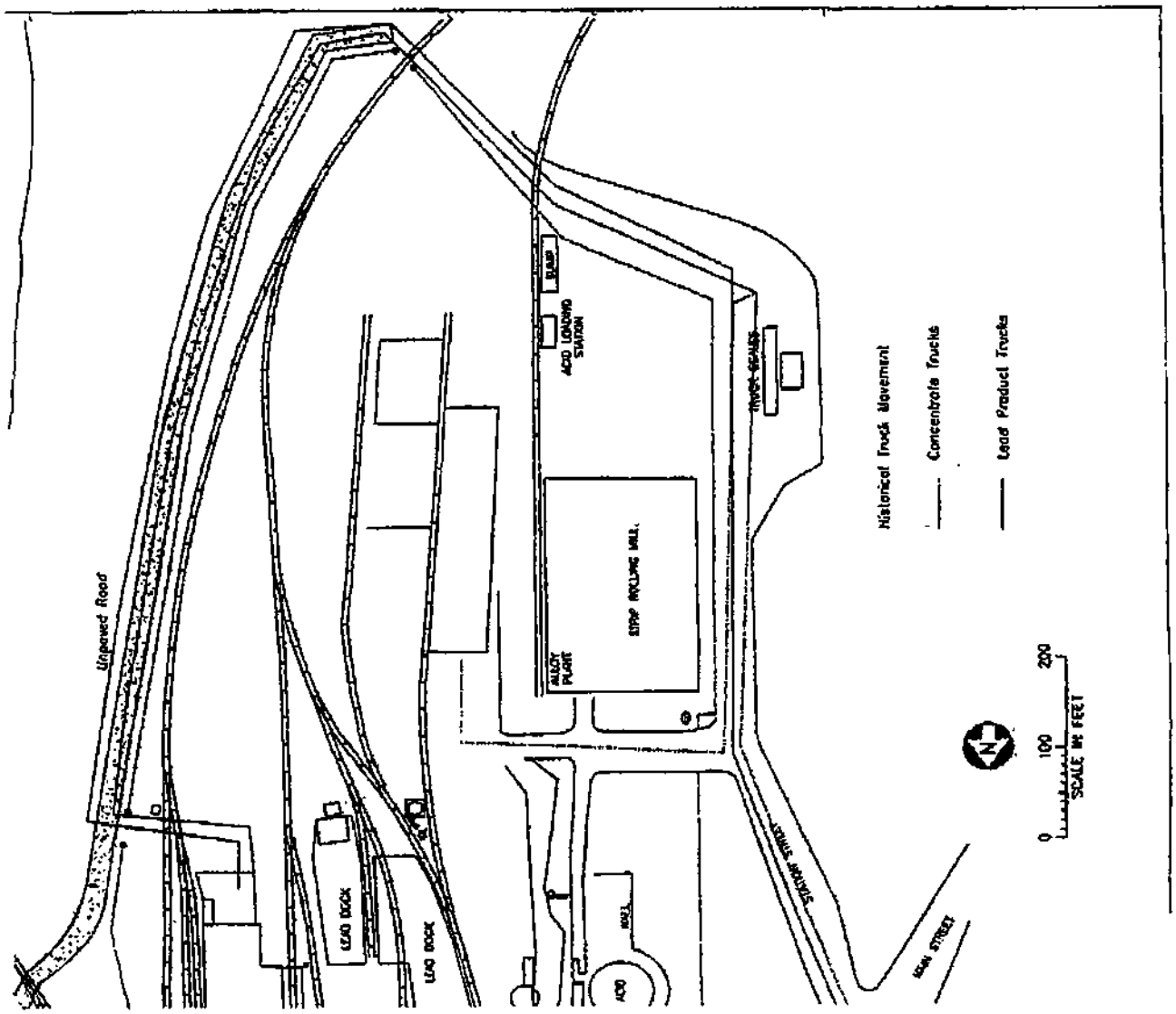
At the meeting, I mentioned the ability to complete a portion of the furnace enclosure project early. We expect to have the ventilation system installed and operating before but not later than the end of May 2002 in the Blast Furnace/Dross Plant building. This is two months prior to the deadline of July 31, 2002. However, this will only provide partial, although substantial ventilation, since the final building enclosure will occur subsequent to that. This is necessary to ensure that there is no safety risk from carbon monoxide by enclosing a combustion source in an unventilated building. Therefore we will get substantial emission reduction but cannot promise final project completion prior to the original date. The maximum effort will be put on this project, which is far and away the most significant emission of the remaining sources. At that point we will review the possibilities regarding the contingency projects.

We will be happy to discuss any of these points when the face-to-face meeting occurs, I assume after the first of the year. Dan Schuette indicated that he would be proposing some dates for that meeting.

Very truly yours,

Daniel L. Vornberg

Cc: Jeff Zelms
Lou Marucheau
Clif Gray
Dan Schuette
Dave Mosby
Tony Petruska
Jim Lanzafame



This map shows the historical movement of concentrate and finished lead to and from the Herculaneum Lead Smelter. The dashed line is the travel path of concentrate trucks and the solid like is the travel path of finished lead trucks.

This map shows the present movement of concentrate and finished lead to and from the Herculaneum Lead Smelter. The dashed line is the travel path of concentrate trucks and the solid like is the travel path of finished lead trucks.